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**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

ALICIA HERNANDEZ et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 3:18-cv-07354-WHA

**NOTICE OF PROPOSED CLASS
ACTION SETTLEMENT AND
REQUEST TO CONTINUE DEADLINE
TO MAIL LITIGATION CLASS
NOTICE**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

The parties jointly and respectfully notify the Court that they have reached a proposed settlement for the certified class and have a signed (fully executed) settlement agreement. Class counsel will file a motion for preliminary approval of the proposed settlement no later than next Tuesday, March 31, 2020. In light of the proposed settlement, the parties respectfully request that the March 30, 2020 deadline (Dkt. 256 at 2) for Heffler Claims Group to mail out notice of the litigation class be continued pending the approval process.

While the parties believe the proposed settlement is sufficient reason to continue the litigation class notice deadline to prevent class member confusion, we also note that due to government mandates stemming from Covid-19, the earliest date that Heffler could mail notice would be April 2, 2020. Heffler's employees are working remotely as much as possible and its mailroom employees are only on site Thursdays in order to reduce their risk of exposure. Therefore, Heffler would not be able to mail out notice until April 2, 2020. *See* Declaration of Mark Rapazzini at ¶ 3-4.

Dated: March 27, 2020

Respectfully submitted,

/s/ Michael Schrag

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